UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, Washington 98101

September 20, 2002

Reply To
Attn Of: ECL-113

Commander, Ft. Lewis *(sent via e-mail and regular mail)*
Directorate of Public Works
ATTN: AFZH-DEQ MS 17 (Mr. Eric Waehling)
Building 2012, Room 323
Ft. Lewis, WA 98433-9500

Subject: Record of Decision, Multiple Sites, Camp Bonneville, Washington, prepared by URS, for the US Army Corp of Engineers, and dated August 2002

Dear Eric:

Please find EPA's comments on the subject document enclosed, which primarily relate to establishing a clear basis in the text and/or the administrative record for the proposed decision. Also, please take special note of comment #21 regarding necessary institutional controls as this is an important aspect of any ROD to spell these out specifically.
(See: "Institutional Controls and Transfer of Real Property" http://www.epa.gov/swerffrr/doc/fi-icops.106.pdf and "Institutional Controls: A Site Manager's Guide to Identifying, Evaluating, and Selecting Institutional Controls at Superfund and RCRA Corrective Action Cleanups" http://www.epa.gov/superfund/action/ic/guide.htm)

However, of primary importance is the complete omission of a proposed plan. The subject document cites CERCLA (see "declaration of the decision") as the authorizing statute for the action being taken. Section 120(a)(2) of CERCLA requires that "all guidelines, rules, regulations, and criteria applicable to . . . remedial actions at [privately-owned] facilities" are applicable to federally-owned and controlled facilities. Likewise, Section 120(a)(4) indicates that state laws concerning removal and remedial actions shall apply to response actions at facilities owned or operated by federal agencies. The National Contingency Plan (NCP) provides that the selection of a remedial action is a two-step process (40 CFR Section 300.430(f)(ii)). First, the lead agency identifies a preferred alternative and presents it to the public in a proposed plan for review and public comment. Second, the lead agency shall review the public comments and consult the state and, in this case, EPA as well, in order to determine whether the preferred alternative remains the most appropriate remedial action for the site. The lead agency then makes the final remedy selection and documents that decision in a Record of Decision. The title of the document is important as it relates to the procedure under the law that you are following and it is the facial indicator that the NCP is being followed as required which should avoid

misunderstandings by the public and potential unnecessary litigation.[1] . "Draft ROD" has the legal connotation that public comment has or is being received on a proposed plan, legally speaking. It is our understanding that MTCA also requires proposed cleanup decisions to be subject to public comment.

The proposed plan needs to be a document designed for public consumption and comment. For all but the most complicated sites (e.g. Hanford, CdA, INEEL) these are typically about 20 pages to aid the public in the review of the document, referring them to other documents for more detail. The "Draft ROD" is document is far too long for a proposed plan. In that context, some of the enclosed comments may be better memorialized by citation in the proposed plan and in more detail in the subsequent ROD after public comment is received (See: "Guide to Preparing Superfund Proposed Plans, Records of Decision, and Other Remedy Selection Decision Documents" http://www.epa.gov/superfund/resources/remedy/rods/index.htm and "Remedy Documentation" http://www.epa.gov/superfund/action/guidance/remedy/document.htm).

Additionally, we assume the Army has complied and is maintaining the administrative record supporting the proposed remedy and that will have it available for public comment as required by 40 CFR Sections 300.800 through 300.825. I note that page 3-1 in the Draft ROD provides locations for where the record is or will be located. Please send me a copy of the current index of the administrative record.

EPA highly recommends that this document should be retracted and a draft proposed plan (or MTCA equivalent title) issued for the BCT to comment on prior to a formal public comment on a proposed plan. We trust that the attached comments will also be addressed either directly in the draft proposed plan or additional information supplied to EPA in a response to our comments. After the public comment period and consideration of the comments, the BCT could review a draft ROD that's based on any public comments received. Let me know if I can send you the applicable Proposed Plan/ROD guidance or if you have any other questions or concerns at (206) 553-1220.

Sincerely,

Sean Sheldrake, Project Manager

Enclosure

cc: Rodney Taie, USACE
Chris Maurer, Ecology
Ben Forson, Ecology

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[1] We note that it is only through compliance with the functionally-equivalent procedures of the NCP that provides the Army an exemption to compliance with the National Environmental Policy Act, 42 U.S.C. Section 4321 et. seq., for the cleanup decisions at Camp Bonneville.

INTRODUCTION

At the request of EPA, Gannett Fleming, Incorporated (Gannett Fleming) reviewed the *Record of Decision, Multiple Sites,Camp Bonneville, Washington,* prepared by URS, for the US Army Corp of Engineers, and dated August 2002. Please note that general comments are followed by specific comments below.

General Comments:

1. Paint and Solvent Disposal Area: Please explain why no surface soil samples were collected in this area when soil borings were collected? (AP)

2. Above ground storage tanks: No soil samples were collected at depth. Has it been determined that there was not history of leaks and spills at the site? If yes, please provide in the text. (AP)

3. Why were SVOC's analyzed for in some cases at some sites and not VOC's? Please provide the basis for determining the selected analyses. (AP)

4. Many results for arsenic and chromium stated in the text are above regulatory levels but below background levels. Please provide a description detailing where backgrounds samples were collected throughout Camp Bonneville, the confidence in these samples, and their detected results for each priority pollutant. (AP)

5. The proposed plan/eventual ROD need a better explanation of how the sites being addressed relate or are different of other sites and/or investigations ongoing at the base. Usually, different investigation areas are designated as Operable Units. A proposed plan/ROD for one OU usually describes briefly the other OUs at the Site and explains how the OU being addressed in the PP/ROD relates to them.

Specific Comments:

6. Former Burn Area, Page 4-6: The description of the site characterization indicates that soil borings were collected downgradient from the source. Please explain why these borings were not collected adjacent to the site to better characterize the site. (AP)

7. Grease Pits, Page 4-6: Lindane was detected at concentrations above regulatory levels at this site, however, the text does not state what the remedial action was in response to this or if there was one. Please provide this information. (AP)

8. Former Sewage Pond, Page 4-6: The section states that arsenic in groundwater may be related to background concentrations. This uncertainty should be

clarified before NFRAP is determined for this site. (AP)

9. Hazardous Material Accumulation Point, Page 4-7: Please provide background concentrations for organic compounds for this area. (AP)

10. Washrack 1, Page 4-7: Since lead was found at this site above regulatory cleanup levels, was lead analyzed for in the confirmation samples? (AP)

11. Maintenance Pit, Page 4-7: Do the author(s) mean that this building site will not be suitable for NIFRAP status if the building is raised? Please clarify what is meant in the text. (AP)

12. Pesticide Storage Building, Page 4-8: What triggered soil excavation at this site? Please provide this information. (AP)

13. CS Gas Training Building, Page 4-8: Why were SVOC's analyzed for and not VOC's? (AP)

14. Section 5.4.2, Page 5-7: As a UXO was discovered at this site, please indicate in the text how it has been confirmed that more UXO does not exist at or near this site. (AP)

15. Section 5.4.4, Former Burn Area, Second Paragraph, Page 5-9: Why were soil sample collection locations adjacent to the site and not within the site? (AP)

    Also, this section states that arsenic was not detected in upgradient wells but only in downgradient wells. What should the reader conclude from this fact other than arsenic contamination originates at this site? (AP)

16. Section 5.4.7, Page 5-12: Fecal coliform and fecal streptococcus were found in groundwater, at this location, yet the text does not address or discuss whether this contamination poses any threat to drinking water sources on or off the Camp Bonneville Installation? Perhaps this should be deleted from the text. (AP)/(SS)

17. Appendix B, Table B-1: Please define what the "90th percentile natural background values for metals in soils" represents. Also, why wasn't arsenic and cadmium calculated in this table for Camp Bonneville when the background concentrations, according to the text, for these substances is apparently greater than regulatory levels. (AP)

18. Section 4, Pages 4-6,4-7 and 4-8. Reading through Table 4-4 it is apparent that there many positive detections of a variety of contaminants at most of the individual sites being investigated. The text provides rational for No Further Action on one of several criteria; that the contaminant concentrations are either not above regulatory cleanup levels, are the sole detection above the cleanup

criteria (many times in a limited number of samples) or that the contaminant removal criteria may be impacted by background concentrations of naturally occurring inorganic elements such as Arsenic. (JR)

While this rational may be appropriate in examining individual sites for removal and/or remedial action, the compiled data clearly indicate the presence of a variety of contaminants at measurable concentrations at numerous locations across Camp Bonneville. In the opinion of Gannett Fleming the analytical results in Table 4-4 indicate a need to assess the overall or aggregate impact of the entire site on a watershed/water quality basis and to evaluate potential impacts to downgradient receptors and regional groundwater resources. (JR)

19. Section 5.4, Pages 5-7 and 5-8, Soil Gas Sampling. According to the text soil gas surveys were conducted over a two week period in December 1997 and data collected for analysis of BTEX and halogenated hydrocarbons. Please include mention of specific chlorinated solvents and the type of analysis performed. (JR)

In addition, according to the description of the soil gas sampling conducted at Landfill 2 “There were 11 soil gas samplers planted on December 16th and retrieved on December 30,1997.” This description suggests passive gas collection devices which, depending on the soils used as landfill cover and the depth at which the sampling device was installed may impact the accuracy of the data collected. (JR)

The time of year during which this data was collected is also noteworthy; December is the most difficult time of year to conduct soil gas surveys in the northwest. Cooler shallow soil temperatures and repeated saturation zones descending through the vadose zone soil tend to mute concentrations of contaminants observed at the same soil gas sampling locations when compared to data from the same locations collected at other times of the year such as late spring to early fall. (JR)

Lastly, the accuracy of many of the passive type soil gas sampling devices may be affected by the presence of moisture in the charcoal sorption material. Shallow samplers left buried for two weeks in December in the Camp Bonneville area would certainly be subjected to a considerable amount of available moisture as a result of infiltrating water and humidity. Please include a description of QA/QC sampling that was conducted to insure that the analytical results obtained during the soil gas surveys is an accurate evaluation of potential contaminants in the vadose zone at Landfill 2 and Landfill 3. (JR)

20. Section 5, Page 5-9, Groundwater Sampling. According to this section of the text monitoring wells were installed “...in locations assumed to be upgradient (one well) and downgradient three well) of the Landfill 3." There is no mention of ever conducting a survey of the well casing elevations to provide a reliable datum

from which to measure water levels and to verify the groundwater flow directions. Groundwater elevation data is necessary to insure that the “assumed” locations both upgradient and downgradient of the landfills are, in fact, constructed in locations that adequately monitor the impact of the landfills 2 and 3 on local water quality.

21. Section 5.4.6, Page 5-11, First Paragraph. The text explains, that, due to the large rocks encountered during drilling within the grease pits was not possible due to large rocks and goes on to describe the results of four soil samples collected from a single boring adjacent to each of the pits. There is no description of whether or not the borings are up or down gradient locations and how the locations were selected. No samples were collected at depths below the depth of the bottom of the pits where liquid wastes pool and be concentrated. Considering the range of contaminants detected in the soil at the two grease pit locations assurance that the grease pit sites are adequately characterized, is in the opinion of Gannett Fleming warranted.

22. Section 7, Page 7-1, First Paragraph. According to the text in this section “..institutional controls appropriate for the Reuse of Camp Bonneville will be implemented to protect human health and the environment”. How will contaminants that are likely present in Landfills 2 and 3 and the grease pits be kept from being exposed after the property is out of the Army’s control. While the text goes on to list some general possibilities, but does not provide any specific detail of how the contaminated locations will be memorialized and how the legal restrictions on subsurface disturbance will be preserved as the property passes to subsequent ownership.